



July 19, 2018

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Subject:** *Notice of ex parte presentations  
CAF Performance Metrics (WC Docket No. 10-90)*

Dear Ms. Dortch:

On July 18, 2018, Pradman Kaul, President of Hughes Network Systems, LLC (“Hughes”), Paul Gaske, Executive Vice President and General Manager, North America for Hughes, and I spoke by telephone with Jay Schwarz of the Office of Chairman Pai regarding the *Bureau Order* in the above-captioned docket setting performance metrics for CAF support recipients.<sup>1</sup> On the call, we expressed concern regarding the *Bureau Order’s* decision to require CAF recipients in the higher-latency tier to meet live “conversation-opinion” tests under the Commission’s requirement that bidders in the higher-latency tier demonstrate a mean opinion score (“MOS”) of 4.<sup>2</sup> We emphasized that Hughes is capable of meeting a MOS 4 requirement under the ITU-T Recommendation P.800 standard adopted by the full Commission,<sup>3</sup> and urged the Commission to recognize the listening-opinion test set out in that standard.<sup>4</sup> Our arguments were consistent with those explained in my letter of July 16, 2017 in this docket.<sup>5</sup>

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/

\_\_\_\_\_  
Jennifer A. Manner  
Senior Vice President, Regulatory Affairs

cc: Jay Schwarz

<sup>1</sup> *Connect America Fund*, Order, DA 18-710 (WCB, WTB, and OET, rel. July 6, 2018) (“*Bureau Order*”).

<sup>2</sup> *Id.* at ¶¶ 44-46.

<sup>3</sup> *Connect America Fund, et al*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949, 5957 ¶ 15 (2016).

<sup>4</sup> ITU-T P.800, Methods for Subjective Determination of Transmission Quality (Aug. 1996), at 4 & Annex B.

<sup>5</sup> Letter from Jennifer A. Manner, Hughes, to Marlene H. Dortch, FCC, WC Docket No. 10-90 (filed March 16, 2018).